

MEMO ENDORSED

January 28, 2022

VIA ECF

The Honorable Kenneth M. Karas
United State District Court Judge
United State District Court
Southern District of New York
The Hon. Charles L. Brieant Jr. Federal Building
and United States Courthouse
300 Quarropas Street
White Plains, New York 10601-4150 C

Re: *Rachel Bailey v. C. R. Bard Inc. et al.*; Case No. 7:19-cv-8472-KMK

Dear Judge Karas:

On behalf of plaintiff Rachel Bailey ("Plaintiff") and defendants C.R. Bard, Inc., and Bard Peripheral Vascular, Inc., (collectively, "Bard") (all, collectively, the "Parties") in the above-referenced matter, the Parties respectfully submit this joint letter-motion to request a stay of this case and all upcoming deadlines. The Parties have reached a settlement in principle and are in the process of finalizing the details of the settlement. Accordingly, the Parties jointly move the Court to continue all deadlines and hearings and to stay this case for ninety (90) days as the Parties complete the operative settlement documents and finalize the settlement process during this time.

As discussed in previous filings, this case is one of thousands of cases remanded across the country from the *In Re: Bard Filters Products Liability Litigation MDL*, MDL 2641, in Phoenix, Arizona. The Parties are working diligently toward finalizing the settlement documents necessary in this case and anticipate the settlement process will be concluded within the next ninety (90) days. Accordingly, the Parties jointly request that the Court stay this case and all deadlines for a period of ninety (90) days. If Plaintiff has not filed dismissal papers within ninety (90) days from the stay being granted, the Parties request the opportunity to file a joint status report regarding the status of settlement. Respectfully submitted,

LENZE LAWYERS, PLC

GREENBERG TRAURIG, LLP

By: /s/ Jennifer A. Lenze

By: /s/ Toby S. Soli

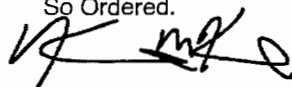
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So Ordered.



1/28/2022